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March 3, 2021

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday (“Hlday”) has sold his home and now wishes to move to Florida to live with his wife. His wife moved to Florida In January for employment purposes. Hlday must be out of his house by March 5, 2021. Defendant has been in consultation with Pretrial Services (“Pretrial”), and the government has been kept apprised of situation, regarding the home sale and potential move to Florida as it developed. By this letter, Hlday respectfully request the that on March 4, 2021, he be permitted to make one round trip from the house to his parents’ house located at an address on Long Island previously provided to the government and the Pretrial to store some of his belongings. He then wishes, on March 5, 2021, to live with his parents until March 11, 2021. On March 11, 2021, he will drive to Florida and begin to live with wife in Florida at an address that has also been provided to the government and Pretrial. Additionally, Hlday respectfully requests permission to obtain and use a cellular telephone that does not have internet capabilities for this travel. The number for this phone will be provided to the government and Pretrial. The government and Pretrial consent to these applications so long as the transfer is approved by the appropriate district in Florida.

Thank you for your Honor's consideration of these requests.

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Andrey Spektor (by ECF)
AUSA Mark Bini (by ECF)
USPTO Brandon Miles (by email)